

Exhibit A

Chris Springer

From: Chris Springer
Sent: Friday, December 3, 2021 12:10 PM
To: Swanson, Alexander; Matt Melamed; Derek Loeser; Lesley Weaver; Anne Davis; Cari Laufenberg; David Ko
Cc: Stein, Deborah L.; Falconer, Russ; Kutscher Clark, Martie; Buongiorno, Matt; Mumm, Laura C.
Subject: RE: Facebook MDL - proposed stip re RFPs
Attachments: Stipulation Voluntary Dismissal Armstrong DRAFT.docx
Categories: Green Category, Yellow Category

Thank you, Alex.

We are reviewing the proposed terms of the stipulation and will let you know whether we agree to those terms.

Regarding your questions, we plan to produce responsive documents for Plaintiffs Senko and King next week in advance of Plaintiff Senko's deposition. We will provide responsive documents from other Plaintiffs on a rolling basis and will prioritize production in light of scheduled depositions. We also plan to send edits to Facebook's proposed search strings for its second set of RFPs next week as well.

Additionally, pursuant to our earlier discussion, attached is a draft stipulation of voluntary dismissal for Plaintiff Armstrong for your review. Please let us know if you have any questions or would like to schedule a call to discuss.

Best,
Chris

--

Chris Springer
Keller Rohrback L.L.P.
Phone: (805) 456-1496
Fax: (805) 456-1497
Email: cspringer@kellerrohrback.com

CONFIDENTIALITY NOTE: This e-mail contains information belonging to the law firm of Keller Rohrback L.L.P., which may be privileged, confidential and/or protected from disclosure. The information is intended only for the use of the individual entity named above. If you think that you have received this message in error, please e-mail the sender. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited.

From: Swanson, Alexander <ASwanson@gibsondunn.com>
Sent: Wednesday, December 1, 2021 5:34 PM
To: Chris Springer <cspringer@KellerRohrback.com>; Matt Melamed <mmelamed@bfalaw.com>; Derek Loeser <dloeser@KellerRohrback.com>; Lesley Weaver <lweaver@bfalaw.com>; Anne Davis <adavis@bfalaw.com>; Cari Laufenberg <claufenberg@KellerRohrback.com>; David Ko <dko@KellerRohrback.com>
Cc: Stein, Deborah L. <DStein@gibsondunn.com>; Falconer, Russ <RFalconer@gibsondunn.com>; Kutscher Clark, Martie <MKutscherClark@gibsondunn.com>; Buongiorno, Matt <MBuongiorno@gibsondunn.com>; Mumm, Laura C.

<LMumm@gibsondunn.com>

Subject: Facebook MDL - proposed stip re RFPs

Chris,

Attached for Plaintiffs' consideration please find a proposed stipulation concerning Facebook RFP Nos. 3, 4, 6, 7, 8, 10, 11, 12, and 13. Please let us know if Plaintiffs will agree to these terms.

In addition, when we met and conferred on November 9, you mentioned that you were working through the search terms for Facebook's second set of RFPs and would have comments shortly. You also indicated that Plaintiffs would soon be making a document production. When can expect those? Given the upcoming depositions, time is of the essence.

Thanks,
Alex

Alexander P. Swanson

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197
Tel +1 213.229.7907 • Fax +1 213.229.6907
ASwanson@gibsondunn.com • www.gibsondunn.com

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.

Derek W. Loeser (admitted *pro hac vice*)
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com

Orin Snyder (admitted *pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Tel.: 212.351.4000
Fax: 212.351.4035
osnyder@gibsondunn.com

Lesley E. Weaver (SBN 191305)
BLEICHMAR FONTI & AULD LLP
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com

Joshua S. Lipshutz (SBN 242557)
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Tel.: 202.955.8500
Fax: 202.467.0539
jlipshutz@gibsondunn.com

Plaintiffs' Co-Lead Counsel
Additional counsel listed on signature page

Attorneys for Defendant Facebook, Inc.
Additional counsel listed on signature page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

Akins et al. v. Facebook, Inc.,
Case No. 3:18-cv-05714-VC

**STIPULATION AND [PROPOSED]
ORDER RE: VOLUNTARY DISMISSAL
WITHOUT PREJUDICE AS TO
PLAINTIFF SAMUEL ARMSTRONG**

Judge: Hon. Vince Chhabria
Courtroom: 4, 17th Floor

**STIPULATION OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO
PLAINTIFF SAM ARMSTRONG**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Civil Local Rule 7-12, Consolidated Plaintiffs (“Plaintiffs”) and Defendant Facebook, Inc. (“Facebook”) (collectively “the Parties”) in this action hereby stipulate to the voluntary dismissal of Plaintiff Samuel Armstrong, without prejudice to his proceeding as a putative class member, each party to bear its own costs. Samuel Armstrong reserves all rights. Facebook reserves all rights, including the right to oppose Samuel Armstrong being re-joined as a named plaintiff at a later date. This stipulation does not operate as to dismiss any other Plaintiffs in this action.

Dated: January 25, 2022

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: _____
Derek W. Loeser

By: _____
Lesley E. Weaver

Derek W. Loeser (admitted *pro hac vice*)
Cari Campen Laufenberg (admitted *pro hac vice*)
David Ko (admitted *pro hac vice*)
Adele A. Daniel (admitted *pro hac vice*)
Benjamin Gould (SBN 250630)
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com
claufenberg@kellerrohrback.com
dko@kellerrohrback.com
adaniel@kellerrohrback.com
bgould@kellerrohrback.com

Lesley E. Weaver (SBN 191305)
Anne K. Davis (SBN 267909)
Matthew S. Melamed (SBN 260272)
Angelica M. Ornelas (SBN 285929)
Joshua D. Samra (SBN 313050)
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com
adavis@bfalaw.com
mmelamed@bfalaw.com
aornelas@bfalaw.com
jsamra@bfalaw.com

Christopher Springer (SBN 291180)
801 Garden Street, Suite 301
Santa Barbara, CA 93101
Tel.: (805) 456-1496
Fax: (805) 456-1497
cspringer@kellerrohrback.com

Eric Fierro (admitted *pro hac vice*)

3101 North Central Avenue, Suite 1400
Phoenix, AZ 85012
Tel: (602) 248-0088
Fax: (602) 248-2822
efierro@kellerrohrback.com

Plaintiffs' Co-Lead Counsel

GIBSON, DUNN, & CRUTCHER LLP

By: _____
Orin Snyder (admitted pro hac vice)
osnyder@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035

Joshua S. Lipshutz (SBN 242557)
jlipshutz@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Telephone: 202.955.8500
Facsimile: 202.467.0539

Kristin A. Linsley (SBN 154148)
klinsley@gibsondunn.com
Martie Kutscher (SBN 302650)
mkutscherclark@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street, Suite 3000
San Francisco, CA 94105-0921
Telephone: 415.393.8200
Facsimile: 415.393.8306

Deborah Stein (SBN 224570)
dstein@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.7520

Attorneys for Defendant Facebook, Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

THE HONORABLE VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Derek W. Loeser, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25th day of January, 2022, at Seattle, Washington.

Derek W. Loeser

CERTIFICATE OF SERVICE

I, Sarah Skaggs, hereby certify that on January 25, 2022, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

In addition, the following were served via email:

Anjeza Hassan
annie.sara@yahoo.com

/s/ Sarah Skaggs
Sarah Skaggs